The common law limited such recovery to the period of the child's minority, but this law has been largely changed in many of the States by statutes and decisions. The courts differ widely as to the measure of such damages. It is generally held that to recover damages beyond the period of the child's minority, it must be shown that the parent is liable to be dependent and that the minor had an intent to assist the parent after attaining his majority. *Thompson* v. *Johnston Bros.*, 86 Wis. 576; *Ry. Co.* v. *Davis*, 55 Ark. 462; *Ry. Co.* v. *Compton*, 75 Tex. 667.

DEFENCE OF DWELLING HOUSE — STEAM LAUNCH WITH NO SLEEPING APARTMENTS IS NOT A DWELLING.—PEOPLE V. BERNARD, 84 N. W. 1092 (Mich.).—Defendant owned a small steam launch which he used as a public conveyance. It had no sleeping or living apartments, but was moored to the dock and used as a sleeping berth by the owner. *Held*, that it was not a house or castle which might be defended against entry by an officer, to the extent of taking his life.

To render a building a dwelling house, it must be a habitation for man, and usually occupied by some person, lodging in it at night. *Scott* v. *State*, 62 Miss. 782.

ELECTIONS — BALLOTS — LACK OF CERTIFICATE ON BACK—VALIDITY.—O'CONNELL V. MATTHEWS ET AL, 59 N. E. Rep. 195 (Mass.).—Under a statute forbidding the deposit in the ballot-box of official ballots unless certified by the city clerk, the petitioner asks for a mandamus to compel the rejection of such ballots. *Held*, that the provisions of the statute forbidding the deposit of such ballots does not forbid the counting of such ballots after their deposit.

The question involved is as to whether the provision of the statute is to be considered as mandatory or directory. In general, the provisions of the Australian ballot law are construed as mandatory. This decision, if generally followed, would practically destroy the efficiency of the Australian system.

ELECTRIC CONDUITS IN STREETS—NEW SERVITUDE—COMPENSATION.—COBURN V. NEW TELEPHONE CO., 59 N. E. 324 (Ind.).—*Held*, the construction of a sub-surface trench in sidewalk, three feet from abutter's lot line, for a conduit for telephone wires, is not a new servitude, entitling the abutter to compensation.

Whether such an occupation of the street is a new use inconsistent with the contemplated purpose of dedication, and therefore an additional servitude, or an improved method of devoting the street to its original purpose, is a question that has caused a wide divergence of opinion among text-writers and courts. *Lewis on Eminent Domain*, Sec. 131; 2 *Dillon Mun. Corp.*, Sec. 698a. The Wisconsin court, in a recent decision, in which all the authorities are reviewed, declares the weight of judicial opinion to be in favor of the former view. *Krueger* v. *Telephone Co.*, 81 N. W. 1041, *and cases cited.* The latter view, however, is also supported by the courts of many States. *Pierce* v. *Drew*, 136 Mass. 75; *People* v. *Eaton*, 59 N. W. 145; *Magee* v. *Overshiner*, 49 N. E. 951; *Julia Building Assn.* v. *Bell Tel. Co.*, 13 Mo. App. 477. The decision in the case at bar is consistent with the previous adjudications of the same Court. *Magee* v. *Overshiner, supra.*

ESTATES IN EXPECTANCY—ASSIGNMENT—VALIDITY.—FULLER V. PARMENTER, 47 Atl. 1079 (Vt.).—Where son assigned expectancy in father's estate and it appeared that father had notice and did not object, *held*, his assent was unnecessary.